

HALL & ASSOCIATES

Suite 701
1620 I Street, NW
Washington, DC 20006-4033
Telephone: (202) 463-1166 Web: <http://www.hall-associates.com> Fax: (202) 463-4207

Reply to E-mail:
acarlesco@hall-associates.com

July 10, 2015

Via FOIA Online

National Freedom of Information Officer
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW (2822T)
Washington, DC 20460
(202) 566-1667

Re: Freedom of Information Act Request for Records Associated with the Assessment of Financial Capabilities Conducted by Municipalities Under the Guidance of EPA's "Combined Sewer Overflows – Guidance for Financial Capability Assessment and Schedule Development" (Feb. 1997).

To Whom This May Concern:

This is a request for a public records pursuant to the Freedom of Information Act ("FOIA"), 5 U.S.C. § 552, as implemented by the Environmental Protection Agency ("EPA") at 40 C.F.R. Part 2. For purposes of this request, the definition of "records" includes, but is not limited to, documents, letters, memoranda, notes, reports, e-mail messages (including e-mails to and from personal e-mail accounts), minutes, handouts, policy statements, data, technical evaluations or analysis, and studies.

Background

The City of Waterloo, ("Waterloo" or "City") located in Black Hawk County, Iowa operates two wastewater treatment plants that discharge into the Cedar River. Such discharge is conducted pursuant to a National Pollutant Discharge Elimination System ("NPDES") permits issued by the State of Iowa. The City and EPA have been actively engaged in evaluating systems to eliminate sanitary sewage overflow events and identifying corrective measures to implement. Recently, EPA Headquarters has asserted in conversations with Hall & Associates that it is *mandatory* for the Agency to apply the approach specified within the Office of Water's "Combined Sewer Overflows – Guidance for Financial Capability Assessment and Schedule Development" (Feb. 1997).

document in assessing the financial capabilities of CSO communities to achieve deadlines stipulated within judicial or administrative orders.

Request

This request seeks any and all records at EPA Headquarters concerning:

- 1) Assessments of financial capabilities conducted by municipalities under the guidance of EPA's "Combined Sewer Overflows – Guidance for Financial Capability Assessment and Schedule Development" (Feb. 1997), submitted to EPA in the past four years which EPA found acceptable, and;
- 2) Document identifying the compliance schedule that was found appropriate by EPA based on the financial capabilities analyses identified in item #1 above.

Please contact the undersigned if the associated search and duplication costs are anticipated to exceed \$250.00. Please duplicate the records that are responsive to this request and send it to the undersigned at the above address. If the requested record is withheld based upon any asserted privilege, please identify the basis for the non-disclosure.

If you have any questions regarding this request, please do not hesitate to contact this office so as to ensure that only the necessary document is duplicated.

Respectfully,

Adam Carlesco
Hall & Associates
1620 I St., NW
Washington, DC 20006-4033
(202) 463-1166
acarlesco@hall-associates.com